

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

ROSY GIRON DE REYES, *et al.*,

Plaintiff,

v.

WAPLES MOBILE HOME PARK
LIMITED PARTNERSHIP, *et al.*,

Defendants.

Civil No.: 1:16cv563-TSE-TCB

NOTICE OF FILING OF DEFENDANTS' MOTION TO SEAL

PLEASE TAKE NOTICE that pursuant to Local Civil Rule 5, Defendants Waples Mobile Home Park Limited Partnership, Waples Project Limited Partnership, and A. J. Dwoskin & Associates, Inc. (collectively "Defendants"), by counsel and in accordance with the Protective Order entered in this matter on August 18, 2016 (Dkt. 45) hereby gives public notice that a Motion to Seal was filed on November 23, 2016 to respectfully move this Court for entry of an Order directing that the confidential documents and information attached to and cited to in Defendants' Motion for Summary Judgment filed on November 23, 2016 be sealed. Because Plaintiffs and Defendants labeled certain documents and information as confidential under the Protective Order, Defendants' Motion to Seal respectfully moves the Court to seal the following:

- 1) Plaintiffs' Responses to Defendants' Interrogatories and Requests for Admission, which are attached as Exhibits 1-8, 31 to Defendants' memorandum in support of the Motion for Summary Judgment;
- 2) Plaintiffs' deposition transcripts, which are attached as Exhibits 9-16 to Defendants' memorandum in support of the Motion for Summary Judgment;

- 3) An email regarding Defendants' marketing efforts and a 2014 marketing plan of Defendants, attached to Defendants' memorandum in support of the Motion for Summary Judgment as Exhibits 32-33;
- 4) A letter to an unconnected third-party tenant containing private identifying information attached to Defendants' memorandum in support of the Motion for Summary Judgment as Exhibit 34; and
- 5) A portion of Defendants' memorandum in support of Defendants' Motion for Summary Judgment which cites to Plaintiffs' Responses to Defendants' Interrogatories and Requests for Admission, Plaintiffs' deposition transcripts, Defendants' exhibits regarding Defendants' marketing efforts, and the letter to the unconnected third-party tenant.

Defendants' Motion to Seal was filed on November 23, 2016 and memoranda in support of or in opposition to the motion must be filed within seven (7) days after the filing of Defendants' Motion to Seal, and all or part of such memoranda may be designated as confidential. Further, any person objecting to the motion must file an objection with the Clerk within seven (7) days after the filing of the Defendants' Motion to Seal and if no objection is filed in a timely manner, the Court may treat the motion as uncontested.

Respectfully submitted,

WAPLES MOBILE HOME PARK LIMITED
PARTNERSHIP, WAPLES PROJECT LIMITED
PARTNERSHIP AND
A. J. DWOSKIN & ASSOCIATES, INC.

/s/

Michael S. Dingman (VSB No. 30031)

Justin deBettencourt (VSB No. 83806)

7900 Tysons One Place

Suite 500

McLean, Virginia 22102

(703) 641-4200 (Telephone)

(703) 641-4340 (Facsimile)

mdingman@reedsmith.com

jdebettencourt@reedsmith.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of November, 2016, I caused the foregoing to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing to all counsel of record.

/s/

Michael S. Dingman (VSB No. 30031)

Justin deBettencourt (VSB No. 83806)

7900 Tysons One Place

Suite 500

McLean, Virginia 22102

(703) 641-4200 (Telephone)

(703) 641-4340 (Facsimile)

mdingman@reedsmith.com

jdebettencourt@reedsmith.com